

## REMARKS

### 1. Introduction

In the Office Action mailed September 4, 2009, the Examiner rejected claims 1, 3, 4, and 6-9 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz et al., U.S. Pub. No. 2002/0059434 ("Karaoguz") in view of Lu et al., U.S. Patent No. 6,694,134 ("Lu") and further in view of Forte, U.S. Patent No. 7,162,020 ("Forte"). The Examiner rejected claims 10 and 11 under 35 U.S.C. § 103(a) as being unpatentable over Karaoguz in view of Lu and Forte, and further in view of Thornton et al., U.S. Pub. No. 2002/0101860 ("Thornton").

For the reasons set forth below, Applicants request reconsideration and allowance of all pending claims.

### 2. Response to the Claim Rejections

Of the claims currently pending, claim 1 is independent. The Examiner has rejected claim 1 under § 103(a) as being unpatentable over Karaoguz in view of Lu and further in view of Forte. Applicants submit that the rejection of claim 1 is clearly erroneous and should be withdrawn because (a) the Examiner has ignored the element of "wherein said first data register is a home location register (HLR)" and (b) Forte does not teach at least one mobility management message that facilitates roaming. These two points are discussed below.

#### **a. The Examiner has ignored the element of "wherein said first data register is a home location register (HLR)"**

In the Response filed May 15, 2009, Applicants amended claim 1 to recite "wherein said first data register is a home location register (HLR)." However, the Examiner has ignored this claim language. Instead, the Examiner has argued that Karagaoz teaches "said WWAN including

a first data register that contains a first data record for multi-mode mobile station,” specifically citing to Fig. 2 and paragraph 38. *See* Office Action, p. 3. However, neither Figure 2 nor paragraph 38 discloses an HLR. Because the Examiner’s rationale for rejecting claim 1 does not even purport to find the element of “wherein said first data register is a home location register (HLR)” in the cited references, the Examiner’s rejection of claim 1 is clearly erroneous and should be withdrawn.

**b. Forte does not teach at least one mobility management message that facilitates roaming**

Claim 1 recites, *inter alia*, “a second data register co-located with said PBX and communicatively coupled to said first data register ... said second data register being able to transmit at least one mobility management message to said first data register, whereby said at least one mobility management message facilitates roaming between said first and second wireless coverage areas.” The Examiner has admitted that the combination of Karaoguz and Lu fails to teach this element. *See* Office Action, pp. 3-4. Instead, the Examiner has relied on Forte, specifically citing to col. 11, lines 51-55 and col. 12, lines 6-22. *See* Office Action, p. 4. But Forte does not teach at least one mobility management message that facilitates roaming.

Col. 11, lines 51-55 refers to a preferred embodiment in which wireless connect units (WC 30 and WC 230) are co-located with a PBX 14. Thus, in the Examiner’s rationale, Forte’s wireless connect unit (WC) corresponds to the “second data register” recited in claim 1. However, nothing in this section suggests that WC 30 or WC 230 would transmit to a first data register in a WWAN at least one mobility management message that facilitates roaming.

In col. 12, lines 6-22, Forte discloses that “the WC module may be connected (directly, indirectly, co-located or remotely) with any other network switching device or communication

system used to process calls.” But that does not teach that the WC module (the “second data register” in the Examiner’s rationale) would transmit the specific kind of message that is recited in claim 1, namely, at least one mobility management message that facilitates roaming.

That disclosure also does not teach that the WC module would transmit a message to a first data register in the WWAN, as recited in claim 1. To the contrary, Forte teaches that WC 30 interfaces with the PSTN, rather than with wireless networks, in order to make the system substantially technology independent:

It should be appreciated that the WC 30 is connected to a wireless carrier through a PSTN 54 and not by unique hardware or an in-office cellular network. As a result, WC 30 only has to interface with conventional components, such as the PBX 14 and PSTN 54. Thus, the system is substantially technology independent.

*See* col. 5, lines 26-31. Thus, in Forte’s approach, WC 30 communicates with PSTN 54, for example, by dialing a telephone number associated with wireless telephone 70 (*see* col. 6, lines 57-59), and PSTN 54, in turn, communicates with the wireless network (*see* col. 5, lines 10-17). Because Forte’s WC does not interface with wireless networks (such as a WWAN), Forte’s WC would not transmit a message to a data register in the WWAN, as recited in claim 1.

Accordingly, Applicants submit that claim 1 is clearly allowable over Karaoguz, Lu, and Forte for at least the foregoing reasons. Applicants further submit that claims 3, 4, 6-11, and 20 are allowable as depending from an allowable claim.

### **3. Claim 20**

The Office Action Summary indicates that claim 20 stands rejected, but the Examiner has provided no rationale for rejecting claim 20. If claim 20 is indeed rejected, Applicants respectfully request the Examiner to set forth the specific grounds on which claim 20 is rejected.

4. **Conclusion**

Applicants submit that the present application is in condition for allowance, and notice to that effect is hereby requested. Should the Examiner feel that further dialog would advance the subject application to issuance, the Examiner is invited to telephone the undersigned at any time at (312) 913-0001.

Respectfully submitted,

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